STATE OF COLORADO

Roy Romer, Governor
Patti Shwayder, Executive Director
Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80222-1530
Phone (303) 692-2000

Laboratory Building
4210 E. 11th Avenue
Denver, Colorado 80220-3716
(303) 691-4700

Colorado Department
of Public Health
and Environment

Howard A. Roitman, Division Director
Hazardous Materials & Waste Management Division

FAX TRANSMISSION SHEET
FAX #: 759-5355

IMMEDIATE DELIVERY TO: M. Akok, D. Steffin

COMPANY/AGENCY: RMRS

TELEPHONE #:

TELEFAX #: 966-8244

FROM: C. Gilbreath

TELEPHONE #:

SUBJECT: 123 AM DRAFT COMMENTS

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COMMENTS: Please distribute to Kaiser-Hill

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Hazardous Materials and Waste Management Division
Building 123 Proposed Action Memorandum Comments

Section	Comment
2.1.1	RCRA Unit 40 - "Closure of RCRA Unit 40 will be conducted in accordance with the Site's Part B RCRA permit..." Unit 40 is not a permitted unit. Partial closure of this interim status unit requires submittal and approval of a closure plan in accordance with Part 265, Subpart G of the Colorado Hazardous Waste Regulations (CHWR) which includes a 30 day public comment period.
2.1.2	IHSS 148 - The sampling and analysis plan (SAP) for IHSS 148 must be submitted and approved by the Division prior to implementation. Public comment is not required, therefore, the final PAM should describe the approval mechanism for the sampling, analysis and remediation of both IHSS 148 and UBC 123 (e.g., the SAP shall be submitted to the Division at least 30 days prior to implementation). In the event that the SAP has not been completed, a compliance schedule which identifies the date for submittal of the SAP to the Division should be added to the final PAM.
2.2.4	Building 123S - "The facility has been closed for approximately one year." Clarify the term "closed". Has the building been certified RCRA clean closed, non-operational or shutdown?
2.3.1	Asbestos - Identify the State of Colorado regulation which requires the submittal of either a Demolition Notification form or an Asbestos Abatement Notification form.
2.3.2	Beryllium - This section reads, "No samples identified the presence of beryllium." The Reconnaissance Level Characterization Report however, states "No samples identified the presence of beryllium above the RFETS site housekeeping level of 25 ug/ft^2." Define the term "Site housekeeping level".
2.3.4	RCRA Hazardous Waste in SAAs - For previously generated hazardous waste, characterization should have already been completed using either process knowledge or sampling and analysis results. Revise the paragraph accordingly. In addition, hasn't the waste already been containerized and labeled?
2.3.5	Perchloric Acid - Identify the procedure(s), training and personnel to be used to flush and rinse potentially shock sensitive crystals in the hoods. As identified in the PAM, crystallized perchloric acid may be shock sensitive and represent a hazard. As a result, ensuring safe and proper decontamination of the five hoods is critical.
2.3.9	Metals - "All paints indicated detectable levels of one or more of the metals (lead, chromium, cadmium, and arsenic)." Are the levels of metals found in the paint greater that Toxicity Characteristic Leaching Procedure levels? How will the paint be managed?
3.2.2	Characterization - "Non-Impacted Areas are areas that have no potential for residual radiological contamination." As previously described in Section 2.2.1 "Building 123 was one of the first ten buildings constructed at Rocky Flats. The building has always been used as an analytical laboratory and a dosimetry facility." Based on the history and age of the building, it is not technically defensible to say that there are areas in Building 123

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that have no potential for residual radiological contamination.

NUREG 5849 proposes a somewhat different approach which appears to be appropriate for Building 123. It states, "Scans of unaffected areas should cover a minimum of 10% of the floor and lower wall surface area. At least 30 randomly selected measurement locations or an average measurement of 1 per 50 m^2 of building surface area, whichever is greater, for total and removable activity, should be performed for each survey unit. These locations should include all building surfaces. Identification of activity levels in excess of 25% of the guideline, either by scans or measurements, will require reclassification of the area to the "affected" category...". Will the areas considered non-radioactively contaminated be classified as "non-impacted areas" or as class 3 impacted areas?

3.2.2 Soil sampling of the surrounding process waste lines and the IHSS 148 areas should include sampling for nitrates.

3.5 Waste Management - "Working under the direction of RMRS, the qualified and trained subcontractor will also load all hazardous, LLW, and LLM waste into approved containers...and make certain that all regulatory requirements are met." Define the training requirements for the subcontractor(s) generating and managing hazardous and mixed waste.

5.1.1 Airborne - "Fugitive dust emissions are appropriate for the demolition." The statement should read *fugitive emission controls*. Demolition activities mentioned are subject to the AQCC's Regulation No. 1, Section III.D.2.h., which does not require a permit, however an abatement plan must be in place and meet the requirements listed in the regulation.

5.2 This section should clearly specify whether the identified regulatory requirements are applicable or whether they are merely relevant and appropriate. This is an important distinction because a requirement determined to be applicable must be met in its entirety, while a requirement that is relevant and appropriate needs to be met considering site conditions and protection of human health and the environment.

5.2.1 RCRA - This section does not include all of the ARARs associated with RCRA. For example, if batteries will be managed as universal waste then the requirements of Part 279 of the CHWR are applicable requirements. In addition, the land disposal restriction (LDR) treatment standards of Part 268 are applicable to any hazardous waste removed from the area of contamination and to any hazardous waste that is excavated from the area of contamination, managed within another unit, and returned to the area of contamination. Finally, the closure requirements of Part 265 are applicable to areas associated with RCRA Unit 40 if hazardous waste was managed in that unit after November 8, 1980. If hazardous waste was not managed after that date, then those requirements may still be relevant and appropriate.

This section states that fluorescent lights will be managed as universal waste. However, the definition of universal waste does not include fluorescent lights, at this time.

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<u>General Comments:</u>

1) The Building 123 PAM does not clearly identify anticipated monitoring activities throughout the decommissioning process. The PAM and the Building 123 Reconnaissance Level Characterization Report identify actual and potential radiological and chemical contamination within the building and surrounding soils. The PAM, however, does not describe necessary air monitoring during decontamination and demolition of the building. In light of the recent problems the Site experienced with the remediation of the T3 and T4 trenches, air should be continuously monitored for radionuclides and beryllium, at a minimum. The PAM doesn't necessarily need to completely describe and define monitoring activities but at a minimum, the PAM must reference the appropriate monitoring procedure(s) for all decontamination and demolition activities to be conducted. This monitoring plan must be available upon request prior to implementation of proposed decommissioning activities. In addition, the SAP for IHSS 178 and UBC 123 should clearly describe any necessary air and water monitoring requirements.

2) It seems premature to submit a PAM for the under-building contamination before necessary characterization has been/can be done. This lack of characterization leads to a lack of the detail that is required in a decision document like a PAM. Section 3.2.4 would typically be expanded to include detailed remediation methods. Once the SAP has been completed, a Remediation Plan which identifies the remediation activities to be utilized shall be submitted to the Division prior to implementation.

Statements that the remediation "will be done according to established procedures" and that "several locations have undergone similar remediation" seem to be used to excuse the lack of detail. This section should not use vague terms like "could", but should describe or reference specific procedures.

Other specifics that should be included, if applicable, are:
- air monitoring/air pollution control permits;
- other specific requirements or applicable regulations (cited);
- specific cleanup target levels/performance standards; and
- Radiological Work Permit should be mentioned in 5.1.2.

3) The SAP and Remediation Plan for IHSS 148 and UBC 123 should be included in the Section 3.2.1 list of documents to be prepared. These documents do not go out for public comment, but do require Division approval.

4) The anticipated evaluation of the Environmental Checklist needs to be included in this PAM.

5) The schedule allows for completion of the project within 6 months from the start of building demolition, but shows a 1½ month overlap of building demolition with IHSS remediation. How will both these activities happen simultaneously?

6) The PAM does not identify tank systems and/or valve vaults related to the Original Process Waste Lines. What tank systems and/or valve vaults are connected to the Building 123 process waste system and are they to be decommissioned as part of this PAM? Tank 428 for instance is designed to collect waste generated from Building 123 and should be decommissioned as part of this PAM.

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